## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CATHY CARTER,	)
Plaintiff,	)
V.	) Civil Action No.: ) 1:20-cv-01674-TWT
PAUL HOWARD, in his individual and official capacity, et al	) ) )
Defendants.	)

## <u>PURSUANT TO 28 U.S.C. § 1746</u>

1.

I, **Tisa Grimes**, a Georgia citizen, declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct:

2.

My name is Tisa Grimes, and I am older than 18 years of age, and I am sui juris and prepared to offer testimony in this case.

3.

On this 9<sup>th</sup> day of December 2022, I make this **DECLARATION** based upon my personal knowledge of its contents, and to the best of my knowledge everything contained in this **DECLARATION** is true and correct.

4.

I was the Human Resource Director / Office Manager for The Fulton County District Attorney's Office from January 10, 2018, through December 04, 2019.

5.

During my time as Human Resources Director / Office Manager I witnessed Cathy Carter have the autonomy to arrive at work and leave at her own accordance.

During my tenure as the Human Resources Director / Office Manager, I recall multiple occasions when Cathy Carter would either show up to work late, leave work early, or fail to report to work at all, and I witnessed in a few staff meetings Paul Howard's expressed frustration in pursuing disciplinary action against Ms. Carter's said conduct and behavior. But I, as Human Resources Director / Office Manager do not recall Paul Howard acting upon his expressed frustration and enforcing disciplinary action. Except for Paul Howard providing Cathy Carter a probationary letter on or about April 2019 related to her attendance and punctuality.

8.

During my employment as Human Resources Director / Office Manager in the Fulton County District Attorney's Office, Fulton County Government supplemented by the District Attorney's Office utilized Kronos as the payroll timekeeping system.

9.

When Cathy Carter was placed on probation on or about April 2019 for 60 days, she was required to physically sign an attendance sheet prepared by Lynne Nelson, Chief of Staff instructed by Paul Howard to track Cathy Carter's daily attendance, which detailed her arrival time to work and departure time from work.

10.

I witnessed as Human Resources Director / Office Manager while in a staff meeting with Paul Howard and Lynne Nelson a discussion related to Cathy Carter taking leave under FMLA; during this meeting, Paul Howard was upset about Ms. Carter potentially taking FMLA and expressed frustration with Cathy's absenteeism and applying for FMLA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this  $\frac{94h}{1}$  day of December 2022.

Tisa Grimes